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15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

17 KARL HANSEN,  
18 Plaintiff,  
vs.  
19 ELON MUSK; TESLA, INC.; TELS  
20 MOTORS, INC.; U.S. SECURITY  
ASSOCIATES; DOES 1 THROUGH 50,  
21 Defendants.  
22

Case No. 3-19-cv-00413-LRH-WGC

**STIPULATION TO STAY PRETRIAL  
DEADLINES**

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28 U.S. SECURITY ASSOCIATES

Pursuant to LR IA 6 of the Local Rules of Practice for the District Court for the District of Nevada, Plaintiff Karl Hansen and Defendants Elon Musk (“Musk”), Tesla, Inc., Tesla Motors, Inc. (collectively the “Tesla Parties”), and U.S. Security Associates (“USSA”) (collectively “Parties”) by and through their respective counsel, hereby stipulate and jointly move this Court to stay the remaining deadlines set forth in the Court’s Amended Scheduling Order of March 23, 2020 (Docket Entry “D.E.” 43) in light of the following:

On February 27, 2020, the Tesla Parties filed a motion to compel arbitration. (D.E. 39.) On March 10, 2020, Plaintiff filed an opposition to the Tesla Parties’ motion to compel arbitration. (D.E. 40.) On March 17, 2020, the Tesla Parties filed a reply in support of their motion to compel arbitration. (D.E. 41.) On March 27, 2020, USSA filed a motion to compel arbitration. (D.E. 44.) On April 7, 2020, Plaintiff filed an opposition to USSA’s motion to compel arbitration. (D.E. 45.) On April 14, 2020, USSA filed a reply in support of their motion to compel arbitration. (D.E. 47.) This Court’s ruling on the motions to compel arbitration will potentially change the scope and procedural posture of this matter.

As further grounds, on April 17, Plaintiff filed a motion to compel Defendants’ written discovery responses. (D.E. 48.) On May 1, the Defendants filed oppositions to Plaintiff’s motion to compel discovery in light of the pending motions to compel arbitration. (D.E. 50, 51.)

WHEREFORE, the Parties hereby stipulate and respectfully move this Court to enter an Order staying the remaining deadlines set forth in its March 20, 2020 Order pending resolution of the pending motions to compel arbitration and compel discovery.

Jointly and respectfully submitted:

Dated: June 4, 2020

THE EMPLOYMENT LAW GROUP

/s/  
Nicholas Woodfield

-and-

/s/  
Mark R. Thierman  
Thierman Buck, LLP  
*Attorney for Karl Hansen*

1 Date: June 4, 2020

SEYFARTH SHAW LLP

2  
3 /s/

Christopher F. Robertson, Esq.

4 -and-

5 SKLAR WILLIAMS, PLLC

6  
7 /s/

Crane M. Pomerantz, Esq.

8 *Attorneys for Elon Musk, Tesla, Inc., and*  
9 *Tesla Motors, Inc.*

10 Date: June 4, 2020

MARTENSON, HASBROUCK & SIMON LLP

11  
12 /s/

Jeremy T. Naftel

13 -and-

14 HOLLAND AND HART, LLP

15  
16 /s/

Matt T. Cecil

17 *Attorneys for U.S. Security Associates*

18  
19 IT IS SO ORDERED:

20 *Walter G. Cobb*

21 UNITED STATES MAGISTRATE JUDGE

22  
23 DATED: June 5, 2020.